

ROCHE FREEDMAN LLP  
Constantine P. Economides (*pro hac vice*)  
Southeast Financial Center  
200 S Biscayne Blvd  
Suite 5500  
Miami, FL 33131  
Email: [ceconomides@rcfllp.com](mailto:ceconomides@rcfllp.com)  
Telephone: 305-851-5997

Attorneys for Plaintiff,  
Ariel Abittan

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN JOSE DIVISION**

ARIEL ABITTAN,

Case No. 5:20-CV-09340-NC

**PLAINTIFF.**

## **STIPULATION SETTING BRIEFING SCHEDULE AND EXTENDING TIME TO RESPOND AND [PROPOSED] ORDER**

V.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A YUTING CHEN), DAMIEN DING (A/K/A DAMIEN LEUNG, A/K/A TAO DING), TEMUJIN LABS INC. (A DELAWARE CORPORATION), AND TEMUJIN LABS INC. (A CAYMAN CORPORATION).

Judge: Nathanael Cousins

## DEFENDANTS.

and

EIAN LABS INC.

## NOMINAL DEFENDANT.

1 Pursuant to Civil Local Rules 6-1, 6-2, 16-2 and 7-12, Plaintiff Ariel Abittan (“Plaintiff”)  
2 and Defendant Temujin Labs Inc. (Delaware) (“Temujin Delaware”), by and through their  
3 respective counsel, stipulate as follows:

4 WHEREAS, Plaintiff filed his complaint on December 24, 2021;

5 WHEREAS, Temujin Cayman and the Individual Defendants (“Moving Defendants”)  
6 filed a motion to dismiss [ECF No. 53] on May 28, 2021;

7 WHEREAS, counsel for the parties have met and conferred and agree that, in the interest  
8 of efficiency, and subject to the Court’s approval, an extension of the briefing schedule would  
9 assist the parties in coordinating overlapping commitments;

10 ACCORDINGLY, IT IS HEREBY STIPULATED, pursuant to Civil L.R. 7-12, by and  
11 between the undersigned counsel for the parties, that:

12 1. The deadlines for Plaintiff’s response to the motion to dismiss [ECF No. 53]  
13 is extended from June 11, 2021, to June 18, 2021;  
14 2. The deadline for the Moving Defendants’ reply is extended from June 18,  
15 2021, to July 9, 2021;  
16 3. The hearing is continued from July 7, 2021, to July 28, 2021, or any other  
date that the Court may set.

17  
18 Dated: June 9, 2021 ROCHE FREEDMAN LLP

19 By: /s/ Constantine P. Economides  
20 Constantine P. Economides  
21 Attorneys for Plaintiff Ariel Abittan

22 Dated: June 9, 2021 FENWICK & WEST LLP

23 By: /s/ Felix Lee  
24 Felix Lee  
25 Attorneys for Defendants

26 Pursuant to Civil L.R. 5-1(i)(3), all signatories concur in filing this stipulation.

27 Dated: June 9, 2021 By: /s/ Constantine P. Economides  
28 Constantine P. Economides

\*\*\*

1  
2                   **[PROPOSED] ORDER**  
3

4  
5 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
6

7 Dated: \_\_\_\_\_  
8

9  
10                   The Honorable Nathanael Cousins  
11                   United States Magistrate Judge  
12

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28